

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT COURT OF MASSACHUSETTS

ARBOR NETWORKS, INC.,

Plaintiff,

v.

WILLIAM E. RONCA III, RICHARD SHIRLEY,  
DOUGLAS FLEMING, JAMES GILL, JAMES  
NEEL, JASON MCEACHIN, MICHAEL L.  
PORTER, ANDREW HENKART, PAUL  
SCANLON, MICHAEL HOLLYMAN, and  
RED LAMBDA, INC.,

Defendants.

Civil Action No.: 1:12-cv-11322-NMG

**ASSENTED-TO MOTION OF DEFENDANT RED LAMBDA, INC., FOR LEAVE TO  
FILE OPPOSITION IN EXCESS OF TWENTY PAGES**

Pursuant to Local Rule 7.1(B)(4), the Defendant Red Lambda, Inc. (“Red Lambda”), in the above-captioned matter hereby respectfully requests leave of this Court to file an Opposition to Plaintiff’s Motion for a Temporary Restraining Order and Motion for a Preliminary Injunction (together, the “Motions”) that is in excess of 20 pages. Red Lambda’s Opposition spans 30 pages. As grounds for this Motion, Red Lambda states as follows:

1. Plaintiff Arbor Networks, Inc. (“Arbor”) is seeking immediate injunctive relief against Red Lambda and ten of its employees that would, if allowed, bar Red Lambda from employing at least seven of those employees “in positions that are substantially similar to those held by them while they were in Arbor’s employ.”

2. Arbor’s memorandum of law in support of its Motions contains 30 pages and covers a host of facts, claims, and legal issues.

3. In addition to Arbor’s 30-page memorandum of law, Arbor filed three affidavits in support of its Motions.

4. In order for Red Lambda to fully address the panoply of issues raised by Arbor in support of its Motions, Red Lambda's opposition to the Motions will need to be longer than the 20-page limit imposed by the Local Rules.

5. Accordingly, Red Lambda respectfully seeks permission to submit an Opposition to the Motions that exceeds 20 pages; specifically, Red Lambda seeks permission to file an Opposition that is 30 pages long.

6. Arbor has assented to Red Lambda's request to file an Opposition that is 30 pages long.

7. Red Lambda expressly reserves, and does not waive, its rights to challenge venue and personal jurisdiction.

Respectfully submitted,

RED LAMBDA, INC.

By its attorneys,

/s/ Stephen D. Riden

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Dated: July 26, 2012

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified in the Notice of Electronic Filing and paper or electronic copies will be delivered to those indicated as non-registered participants on July 26, 2012.

/s/ Stephen D. Riden

Stephen D. Riden